

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

JUL - 2 2014

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHERYL TUBBS,

Defendant.

No.

4:14CR00215 AGF/NCC

INDICTMENT

COUNT ONE

The Grand Jury charges:

On or about August 14, 2012, in the Eastern District of Missouri, the defendant,

CHERYL TUBBS,

in a matter within the jurisdiction of the Social Security Administration, an agency of the United States, did knowingly and willfully make and use and cause to be made and used a false document, knowing the same to contain a materially false, fictitious and fraudulent statement, in that, on Form SSA 3373-BK entitled "Function Report Adult," defendant did state and represent and cause to be stated and represented that she had never had a drivers' license, lived at 3722 Palm Street in St. Louis, Missouri with her family, cannot go out alone, and did not provide care for anyone, when in truth and in fact as defendant well knew, her drivers' license was issued in 2010, she lived at 2543 Haber in St. Louis, Missouri with her husband, she could go out alone, and she provided care for small children as a paid nanny.

In violation of Title 18, United States Code, Section 1001.

COUNTS TWO AND THREE

On or about the dates listed below, within the Eastern District of Missouri,

CHERYL TUBBS,

the defendant herein, did embezzle, steal, purloin, or knowingly convert to her use money of the United States or of any department or agency thereof, or any property made or being made under contract for the United States or any department or agency thereof, to wit: funds from the Social Security Administration in the following amounts:

<u>COUNT</u>	<u>DATE</u>	<u>AMOUNT</u>
2	October 1, 2012	\$698.00
3	November 1, 2012	\$698.00

In violation of Title 18, United States Code, Section 641.

A TRUE BILL.

FOREPERSON

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Assistant United States Attorney